

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION

GEORGE HART,

Plaintiff,

v.

OFFICER RUSSELL E. WHITE JR. #13770,
OFFICER JESUS CANO #13648, OFFICER
KRAGNYCKWJ #15153, OFFICER JEFFREY
J. ZWIT #10336, OFFICER LUIS VEGA
#13853, UNKNOWN OFFICERS, and the
CITY OF CHICAGO,

Defendants.

JUDGE ST. EVE
MAGISTRATE JUDGE BROWN

No. 08-c-761

**AGREED MOTION FOR AN EXTENSION OF TIME TO RESPOND TO DEFENDANT
CITY OF CHICAGO'S MOTION TO STRUCTURE DISCOVERY OR, IN THE
ALTERNATIVE, TO BIFURCATE THE *MONELL* CLAIMS AND TO STAY
DISCOVERY AND TRIAL ON THE *MONELL* CLAIMS**

On April 7, 2008, Defendant City of Chicago filed their Motion to Structure Discovery or, alternatively, to bifurcate Plaintiff's *Monell* claims. Counsel for Plaintiff and counsel for the City are currently attempting to reach an agreement regarding the concerns raised in the City's Motion. Specifically, counsel for both Plaintiff and Defendant City of Chicago are willing to initially limit discovery to identifying the unknown officers in this case. At such time as all officers are identified, the parties will likely enter into a stipulation regarding Plaintiff's *Monell* claim. Counsel for Plaintiff and Defendant City of Chicago agree that, in lieu of a full briefing on this issue, they can resolve these matters without judicial intervention. It is expected that counsel for Plaintiff and Defendant City of Chicago will be able to agree to a resolution on these issues within fourteen days.

WHEREFORE, Plaintiff moves this Court for an extension of time to respond to Defendant City of Chicago's Motion to Structure Discovery until May 8, 2008, to allow the parties time to resolve these matters without intervention by this Court.

s/ Erica Faaborg
Erica Faaborg, Esq.
Horwitz, Richardson, and Baker, LLC
20 S. Clark, Suite 500
Chicago, IL 60603
Tel: 312-676-2100
Fax: 312-372-7076
Erica.lobh@gmail.com